

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

SEP 1 2 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL No. 7009 1680 0000 7663 5639 RETURN RECEIPT REQUESTED

Matthew O'Connor President American Jebco Corporation 11330 Melrose Avenue Franklin Park, Illinois 60131

Re: Request for Information EPA ID No.: ILD 005 130 612

Dear Mr. O'Connor:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires American Jebco Corporation (hereinafter, "American Jebco" or "you") to submit certain information relating to process operations and hazardous waste activities at its facility located at 11330 Melrose Avenue in Franklin Park, Illinois.

We are requiring this information to determine American Jebco's compliance status with the Standards Applicable to Generators of Hazardous Waste, Standards of Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, and the Standards for the Management of Used Oil set forth at 35 IAC Parts 722, 724, 725 and 739 [40 Code of Federal Regulations (CFR) Parts 262, 264, 265, and 279].

The enclosure specifies the information you must submit. You must submit this information within twenty-one (21) calendar days of receiving this request to the U.S. Environmental Protection Agency, Attention: Michael Valentino, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, B. You must make any request for confidentiality when you submit

		•			`			1	•	
			•							
						-	•			
										,
	•									
•										
							,			
				÷						
				÷						

the information since any information not so identified may be made available to the public without further notice.

American Jebco must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 <u>et seq.</u>, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

You should direct questions about this request for information to Mr. Valentino, of my staff, at (312) 886-4582.

Sincerely,

Michael Cunningham

Chief

Compliance Section 1

Enclosure

ce: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@Illinois.gov)

		•			
*					
	•		•		
				•	
				d.	
				•	
		•			
	•				

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. All references to "American Jebco" or "you" in the Requests below refer to American Jebco Corporation. All references to "the facility" in the Requests below refer to American Jebco Corporation's facility at 11330 Melrose Avenue in Franklin Park, Illinois, EPA RCRA ID Number ILD 005 130 612.

Requests

- 1. Identify all persons consulted in preparing the answers in response to EPA's Request for Information. Provide the full name and title for each person identified.
- 2. How long have used four-foot fluorescent bulbs been stored at the facility?
- 3. Has American Jebco shipped used fluorescent bulbs offsite in the past three months? If so, please provide copies of all invoices or bills of lading accompanying the shipments.
- 4. Provide photos of all sides of the container in which American Jebco stores used fluorescent bulbs that show the markings on this container.
- 5. During EPA's June 8, 2016 inspection of the facility, Mr. Kutkiewcz informed the EPA inspector that spent solvent cleaning solution is pumped from its container and mixed with oily wastewater. Please describe the steps in this process, from pumping to shipment offsite. Also please identify which employees remove the spent solvent cleaning solution from its container, mixes it with oily wastewater, and prepares the material for shipment.
- 6. Provide an MSDS for the solvent cleaning solution and describe how this solution is managed when it is no longer usable (spent). Describe how American Jebco determines the cleaning solution to be unusable and ready for disposal. Provide the name, address and phone number of the supplier of your solvent cleaning solution. How frequently is your solvent cleaning solution changed?
- 7. Provide copies of all analytical data or waste determinations made by either American Jebco or your wastewater hauler, for the following wastes that American Jebco ships offsite: 1) the oily wastewater; and 2) the oily wastewater and spent solvent cleaning solution mixture. Provide the name, address, phone number and EPA RCRA ID number, if one exists, of your wastewater hauler.

- 8. Provide copies of manifests and/or bills of ladings for all of your oily wastewater and oily wastewater and spent solvent cleaning solution mixture shipments for the years 2015-2016.
- 9. Describe how the oily wastewater is generated, *i.e.*, from what process or processes, and how often.
- 10. Provide all test results for total halogen content for American Jebco's oily wastewater and oily wastewater and spent solvent cleaning solution mixture. If you do not have this information, then American Jebco must test its oily wastewater and oily wastewater and spent solvent cleaning solution mixture for total halogen content and provide those results with this request response, including the test method employed; who performed the testing; which laboratory you used, if any; and the date of testing.
- 11. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Printed Name of Signatory	Deinted Name of Simutan
Printed Name of Signatory	Designated Manager of Circumstance
	Frimed Name of Signatory

	•	,
	•	
•	•	
	•	
		•
•		
	•	
	•	
*		
	•	
		•